

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC. PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY
LITIGATION**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

THIS DOCUMENT RELATES TO:

***Fariba D. Nejat and Mirnejat Nejat v.
Ethicon, Inc., et al.***

Case No. 2:13-cv-01229

NOTICE OF VIDEO DEPOSITION OF

To: Dr. Camran Nezhat
900 Welch Road
Suite 403 (4th floor)
Palo Alto, CA 94304

Notice is hereby given pursuant to Rule 30 of the Federal Rules of Civil Procedure that Plaintiffs will take the video deposition upon oral examination of Dr. Camran Nezhat on July 17, 2017, at 10:00 a.m. at 55 S. Market St., Suite 1500, San Jose, CA 95113 or such other date, time and location as the parties shall agree. This deposition is being taken for the purposes of discovery and such other purposes as authorized by law. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and shall continue from day to day until completed. The Deponent is asked to bring to the deposition the documents as described in Exhibit A regarding the above referenced case.

Date: April 28, 2017

By: /s Alexander H. Ramon
Marcia E. Gerston, Esq.
California Bar Number: 119026
Alexander H. Ramon
California Bar Number: 282867
GREENFIELD DRAA & HARRINGTON LLP
55 S. Market St., Ste. 1500
San Jose, CA 95113
Phone: (408) 995-5600
Fax: (408) 995-0308
mgerston@greenfieldlaw.com

BRADY LAW GROUP
Steven B. Stein, Esq.
California Bar Number: 52829
sbs@bradylawgroup.com

Attorneys for Plaintiff

EXHIBIT A

1. A copy of your current Curriculum Vitae.
2. Your complete medical records regarding the plaintiff.
3. All documents currently in your possession, custody or control, including but not limited to, brochures, training materials, videos, and any communications, including emails, memoranda, and/or letters, received from or sent to Johnson & Johnson (“J&J”), Ethicon, Inc. (“Ethicon”) or any other J&J company, or any of its representatives or employees concerning pelvic mesh products.
4. All documents evidencing any financial relationship, if any, between you and J&J, Ethicon or any other J&J company, including but not limited to, any consulting agreements, agreements to research or otherwise study any J&J or Ethicon pelvic mesh product, and/or contracts, monetary and/or non-monetary benefits, including but not limited to money, travel, and device samples, provided to you by J&J or Ethicon, and/or any of its agents, including amounts, dates, and purpose.
5. A copy of any brochures, documents or other materials you provided to plaintiff regarding pelvic mesh products or procedures or that you routinely provided to patients regarding pelvic mesh products or procedures.

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: /s Alexander H. Ramon
Marcia E. Gerston, Esq.
California Bar Number: 119026
Alexander H. Ramon
California Bar Number: 282867
GREENFIELD DRAA & HARRINGTON LLP
55 S. Market St., Ste. 1500
San Jose, CA 95113
Phone: (408) 995-5600
Fax: (408) 995-0308
mgerston@greenfieldlaw.com

BRADY LAW GROUP
Steven B. Stein, Esq.
California Bar Number: 52829
sbs@bradylawgroup.com

Attorneys for Plaintiff